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February 22, 2006

Ms. Marlene H. Dortch Secretary Ex Parte Presentation Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Wesleyan University, Middletown, CT submits this letter to express our concern that a number-based contribution mechanism could have a substantial detrimental impact on this institution.

We have calculated that our federal universal service obligation would increase from \$1,182/year (\$98.49/month) to \$75,600/year (\$6,300/month) if a number-based approach were adopted, assuming that the per-number fee is \$1.00.

Wesleyan University does not have budgetary flexibility to accommodate this sizable increase. If adopted, the FCC's action would require difficult decisions and possibly significant cuts with respect to institutional programs and services, including, but not limited to

- * the reduction in numbers assigned to professors and researchers operating in multiple locations, thereby limiting their access to students and their research.
- * the reconfiguration of the campus network to an extension-based system under which the institution would maintain a single call-in number.
- * the return of number resources over semester breaks and the elimination of number reserves earmarked for future campus priorities. The shift in policy with respect to maintaining number blocks would significantly impact campus community (and pose potential public safety concerns) with the elimination of the traditional four-digit dialing within the campus.
- * the transition of budgeted funding from education and research-based programs to the telecommunications budget.

Wesleyan University

- asks the FCC to proceed with caution in adopting a number-based plan that does not account for the specific concerns of the higher education community
- supports efforts to modify a number-based proposal through a hybrid approach or through number equivalencies for enterprise customers
- believes that any reform in this proceeding should not substantially disadvantage any particular class of customers, including enterprise customers and low-volume residential customers
- hopes the Commission modifies its universal service policies in a manner that reflects the potential impact on colleges and universities/the higher education community
- suggests that no reform proposals be formally adopted by the Commission until such time as to the full impact of those proposals is studied and understood. Start

Respectfully submitted,

Mr. John C. Meerts Interim VP and Treasurer, VP for Information Technology Services

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